REMARKS

Claims 1-12, 15-19, 23 and 25-27 are pending in this application. By this Amendment, the specification and claims 1, 4-5, 10-12, 15, 17-19 and 23-25 are amended and claims 13-14, 20, 22, 24 and 28-45 are canceled without prejudice or disclaimer. Various amendments are made for clarity and are unrelated to issues of patentability.

The Office Action rejects claims 22-24 under 35 U.S.C. §112, second paragraph. It is respectfully submitted that the above amendments obviate the grounds for rejection. More specifically, features of dependent claim 22 are incorporated into independent claim 19. The amended features of independent claim 19 and dependent claim 23 are clear and definite. Withdrawal of the rejection is respectfully requested.

The Office Action rejects the claims under 35 U.S.C. §102(e) by U.S. Patent Publication 2004/0185899 to Hayem et al. (hereafter Hayem) or under 35 U.S.C. §103(a) over U.S. Patent Publication 2003/0103518 to Han either alone or in combination with Hayem, U.S. Patent Publication 2003/0081666 to Nah, KR 2003-084005 to Lee (hereafter Lee) and/or EP 1 213 941 to Park et al. (hereafter Park). The rejections are respectfully traversed with respect to the pending claims.

Independent claim 1 recites <u>a video chip</u> having an application of packet data services and a first data communication protocol and a second data communication protocol, <u>a first network modem chip</u> coupled to the video chip through an interface and having a protocol stack relating to a first communication network, and <u>a second network modem chip</u> coupled with the video

chip through an interface and having a protocol stack relating to a second communication network. Independent claim 1 also recites that the first data communication protocol of the video chip converts Point to Point Protocol (PPP) packets received from the first network modem chip into Internet Protocol (IP) packets for the video chip, and the first data communication protocol of the video chip converts IP packets in the video chip into PPP packets for the first network modem chip.

The applied references do not teach or suggest at least these features of independent claim 1. More specifically, Han does not teach or suggest that a first data communication protocol of a video chip converts Point to Point Protocol (PPP) packets received from a first network modem chip into Internet Protocol (IP) packets for the video chip, and the first data communication protocol of the video chip converts IP packets in the video chip into PPP packets for the first network modem chip.

The Office Action (on page 4) states that Han does not teach a modem chip, such as the claimed first network modem chip and second network modem chip. Han also does not suggest a second data communication protocol (in combination with a first data communication protocol). There also is no suggestion to modify Han's protocol layer (FIG. 1) in a mobile communication terminal so as to include the claimed first/second data communication protocols and first/second network modem chips.

The Office Action cites Hayem's FIG. 10 as disclosing a second data communication protocol and cites Hayem's FIG. 8 as disclosing a modem chip coupled to another modem chip

through an interface. However, Hayem merely discloses that a host baseband processor 1001 (FIG. 10) includes a modem 1010 and a baseband co-processor includes a modem 1018. However, Hayem does not suggest that the first data communication protocol of the video chip converts Point to Point Protocol (PPP) packets received from the first network modem chip into Internet Protocol (IP) packets for the video chip, and the first data communication protocol of the video chip converts IP packets in the video chip into PPP packets for the first network modem chip, as recited in independent claim 1.

The Office Action attempts to combine Hayem with Han by stating that the motivation is to add a second mode to make the terminal more flexible. Applicant respectfully submits that there is no suggestion or proper motivation to combine the references. The alleged motivation "to make the terminal more flexible" is not proper motivation to combine Han and Hayem.

Additionally, when discussing features of the first/second network modems (and the video chip), the Office Action (on page 6-7) cites Han's paragraphs 26-31 and Hayem's FIG. 10. However, the cited sections do not suggest the first data communication protocol of the video chip converts Point to Point Protocol (PPP) packets received from the first network modem chip into Internet Protocol (IP) packets for the video chip, and the first data communication protocol of the video chip converts IP packets in the video chip into PPP packets for the first network modem chip, as recited in independent claim 1.

For at least the reasons set forth above, Han and Hayem do not teach or suggest all the features of independent claim 1. The other applied references do not teach or suggest the

missing features of independent claim 1. Thus, independent claim 1 defines patentable subject

matter.

Independent claim 11 recites that the terminal performing packet data communication

with the second communication network includes: directly providing a packet to a second

network modem from the video chip when a packet is transmitted from the terminal to the

second communication network in packet data communication, and receiving an IP frame at the

video chip through the second network modem, the video chip performing packet processing

and interworking with a socket when a packet is transmitted from the second communication

network to the terminal. Independent claim 11 further recites that the terminal performing

packet processing by using the first data communication protocol includes: converting an

Internet Protocol (IP) packet to a Point to Point Protocol (PPP) packet in the video chip,

converting the PPP packet into a PPP frame and providing the PPP frame to a first network

modem when a packet is transmitted from the terminal to the first communication network in

packet data communication, and receiving a PPP frame at the video chip through the first

network modem, converting the received PPP frame into an IP frame, and performing packet

processing and interworking with a socket when a packet is transmitted from the first

communication network to the terminal.

For at least similar reasons as set forth above, the applied references do not teach or

suggest at least these features of independent claim 11, which includes features of dependent

claims 13-14. Thus, independent claim 11 defines patentable subject matter.

Independent claim 19 recites judging a system mode by using a terminal including a video chip having a first data communication protocol and a second data communication protocol, and transmitting packet data to a first network when the judged system mode is a first communication service for the first network, the transmitting including <u>performing Internet Protocol (IP) packet processing at the video chip with the first data communication protocol and performing mutual conversion of IP packet and Point to Point Protocol (PPP) packets at the video chip only when in communication with the first communication network</u>. Independent claim 19 also recites transmitting a pertinent Internet Protocol (IP) frame to a second network by transmitting the IP packet directly to a modem chip when the system mode is a second communication service for the second network.

For at least the reasons set forth above, the applied references do not teach or suggest at least these features of independent claim 19, which includes features from dependent claims 20 and 22. Thus, independent claim 19 defines patentable subject matter.

For at least the reasons set forth above, each of independent claims 1, 11 and 19 defines patentable subject matter. Each of the dependent claims depends from one of the independent claims and therefore defines patentable subject matter at least for this reason. In addition, the dependent claims recite features that further and independently distinguish over the applied references.

For example, dependent claim 23 recites converting an Internet Protocol (IP) packet to a Point to Point Protocol (PPP) in the video chip, and converting the IP frame into a PPP frame

in the video chip, transmitting the PPP frame to a first network modem chip, and transmitting the PPP frame to the first network. The applied references do not teach or suggest these features. Thus, dependent claim 23 defines patentable subject matter.

CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Favorable consideration and prompt allowance of claims 1-12, 15-19, 23 and 25-27 are earnestly solicited. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,
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